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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

ANTHONY L. BLANFORD and JOHN K.
BELLVILLE,

Plaintiffs,

v.

MICHAEL J. DUNLEAVY; in his
individual and official capacities;
TUCKERMAN BABCOCK; and the
STATE OF ALASKA,

Defendants.

Case No. 3:19-cv-00036-JWS

**DECLARATION OF
MICHAEL B. BAYLOUS**

I, Michael B. Baylous, declare as follows:

1. Attached as Exhibit A is a November 16, 2018 email to Plaintiffs and other state employees transmitting the memorandum requesting resignations and statements of interest and a template for the resignation and statement of interest.

2. Attached as Exhibit B is a November 17, 2018 Anchorage Daily News article titled *Dunleavy team asks all at-will state workers for resignations*.

3. Attached as Exhibit C are excerpts from the transcript of Gavin Carmichael's January 7, 2021 deposition. Mr. Carmichael was the Chief Operations Officer of Alaska Psychiatric Institute ("API") when Plaintiffs' employment at API ended. He had also served as acting Chief Executive Officer of API.

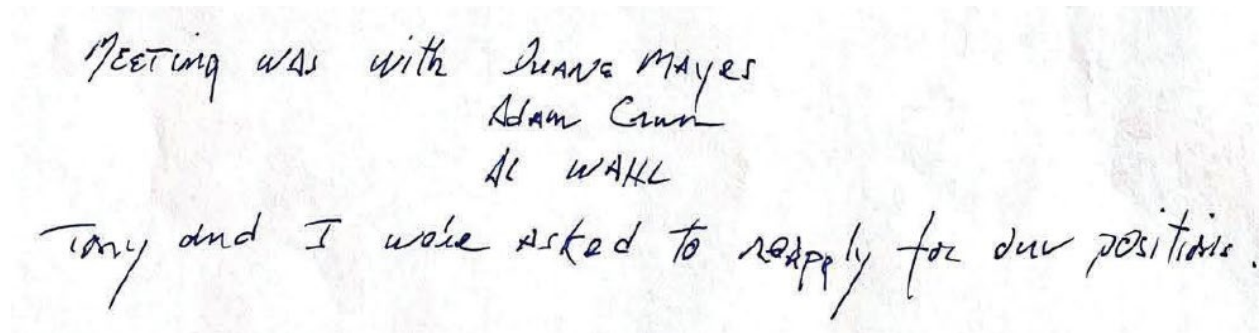
4. Attached as Exhibit D and Exhibit E are June 4, 2018 letters from Department of Health and Social Services (“DHSS”) Commissioner Valerie Davidson to Chief of Staff Scott Kendall requesting authority to hire Dr. Anthony Blanford as Director of Psychiatry for API, and June 5, 2018 authorizations from Chief of Staff Kendall.

5. Attached as Exhibit F is a November 27, 2018 letter from API staff psychiatrists Drs. Deborah Guris, Lee Ann Gee, and John Bellville expressing support for Dr. Blanford.

6. Attached as Exhibit G is letter from Dr. Blanford published November 19, 2018 in the Anchorage Daily News, discussing API and the resignation request.

7. Attached as Exhibit H are excerpts from the transcript of DHSS Commissioner Adam Crum’s January 5, 2021 deposition.

8. Attached as Exhibit I is a photograph of a December 3, 2018 email to Dr. Bellville arranging a meeting. The email contains the hand written notation:



Meeting was with Juane Mayer
Adam Crum
Al Wall
Tony and I were asked to reapply for our positions.

The email was produced by Plaintiffs in this lawsuit.

9. Attached as Exhibit J are excerpts from the transcript of DHSS Deputy Commissioner Albert Wall’s January 5, 2021 deposition.

10. Attached as Exhibit K is a February 4, 2016 letter from DHSS Commissioner Davidson to Chief of Staff Jim Whitaker requesting appointment of Dr. Blanford as a staff psychiatrist at API.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

DATED: April 9, 2021.

By s/Michael B. Baylous
Michael B. Baylous, ABA No. 0905022

I certify that on April 9, 2021, a copy of the foregoing was served electronically on:

Stephen Koteff, skoteff@acluak.org
Joshua Decker, jdecker@acluak.org

s/Michael B. Baylous